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Dear Mr Alder

DRAFT CODE OF PRACTICE FOR THE WELFARE OF GAMEBIRDS REARED FOR SPORTING PURPOSES

Thank you for the opportunity to comment on the draft code. FAWC is pleased to see that its Opinion on the Welfare of Farmed Gamebirds (November 2008) has been thoroughly taken into account in the draft.

On the issue of cages for breeding pheasants and partridges, three Options have been presented (6.11): i.e. (1) No statement about use of cages, (2) Barren cages should not be used, (3) Cages should not be used. The clear recommendation in our Opinion matches Option 2.

A concern is that each of those Options includes the sentence "Any system should be appropriately enriched" with no indication of what appropriate enrichment should be. FAWC supported research proposed by Defra on the design of accommodation for pheasants that meets their physical and behavioural needs, and recommended similar research for partridge accommodation. In advance of this research we suggest that there should be a statement or footnote saying that gamebird keepers should explore methods of enrichment and should share best practice with others, and that a subsequent version of the code will take such experience and other research into account in specifying requirements for enrichment. In the absence of such a statement, there is no pressure against continued use of unsatisfactory "enriched cages" for the foreseeable future.

In a similar way, many of the other recommendations are very general (e.g. 4.4, 6.1ii, 6.1.iv). In other codes more specific guidelines are given on recommended space, enrichment, lighting schedules, etc. It is accepted that because of the different species of gamebirds this is complicated. Also that, without research to back up figures or specific provisions, these can only be based on first principles or best

practice, where this is available. More detail might be forthcoming in responses to some of the specific questions in the consultation.

7.3. There should be a recommendation to maintain treatment records in the flock health plan. The legal requirement to keep records of medicines is mentioned in the appendix, but some indication of actually using this information would be relevant. Maybe this is implicit in 7.2 but reinforcement of the message would be helpful.

9.2. We suggest that there should be a recommendation on support during the release process, based on best practice and, later, on research recommended in FAWC's Opinion.

There are edits needed in Preface para 2 (negative should be negate), 4.3 ("correct particle size" is presumably intended) and 7.3 ("should only be carried out").

Yours sincerely

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FAWC, Pigs, Poultry and Fish Standing Committee